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July 8, 2022

APPLICATION GRANTED
SO ORDERED

VIA ECF

The Honorable John G. Koeltl
United States District Judge
United States District Court – S.D.N.Y.
500 Pearl Street, Room 14A
New York, New York 10007

7/8/22 
John G. Koeltl, U.S.D.J.

Re: ***City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,***
No. 1:15-cv-05345 (JGK) (KHP)

Dear Judge Koeltl:

We represent Triadou SPV S.A. (“Triadou”) in the above-referenced case and write to respectfully request that, consistent with the Court’s July 6, 2022 Order, (ECF 1509), the Court permit Triadou to file under seal certain pretrial submissions that contain information designated confidential by third parties pursuant to the protective order in this matter. As required by Rule VI.A.2 of the Court’s Individual Practices, Triadou will publicly file redacted or slip-sheeted versions of its under-seal filings, and file under seal copies of the unredacted versions of those documents with any proposed redactions highlighted.

Through this letter-motion, Triadou seeks leave to file under seal its (1) Proposed Findings of Fact and Conclusions of Law; and (2) memorandum in support of motion in limine no. 5 to preclude any adverse inference against Triadou and exclude certain deposition testimony, and certain exhibits to the Declaration of Deborah A. Skakel in support thereof. Triadou’s motion in limine no. 5 solely addresses testimony a third party has designated as confidential and filing any portion of the memorandum in support or accompanying exhibits would reveal the information designated for protection by the third party. Triadou therefore intends to submit its memorandum of law in support of motion in limine no. 5 entirely under seal, with only a cover sheet and placeholder as the publicly-filed version.

Pursuant to the Court’s July 6 Order, by August 3, 2022, Triadou will notify third parties of any documents or testimony temporarily filed under seal in connection with today’s submissions and any additional material Triadou may submit in connection with the parties’ filings on July 29, 2022. Triadou will also provide a copy of the Court’s July 6, 2022 Order and advise any third party who intends to seek sealing of the implicated information must submit a letter-motion identifying the basis for sealing by August 10, 2022.

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Thank you for your consideration of this request.

Respectfully submitted,

/s/ Deborah A. Skakel
Deborah A. Skakel